

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 14-CR-248

SHANE M. SELLS,

Defendant.

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**JOINT REQUEST FOR LIFETIME SUPERVISED RELEASE**

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1. The United States of America, by its attorneys, James L. Santelle, United States Attorney for the Eastern District of Wisconsin, and Daniel R. Humble, Assistant United States Attorney, and the defendant, Shane M. Sells, individually and by attorney Krista Halla-Valdes, hereby request that this Court impose a life term of supervised release at his sentencing on May 11, 2015. This joint request is based on the following:

- Mr. Sells is desirous of the structure that supervised release will provide upon his release from confinement and believes that he will need the regular interaction with U.S. Probation and Parole to ensure that he does not isolate himself as he has done in the past, that he continues to receive long term mental health treatment, complies with all prescribed medication, and does not reengage in the behaviors that led to his incarceration.
- Mr. Sells' criminal activities occurred over an extended period of time exceeding a decade during which he knew his behavior to be wrong, often expressed a desire to reach out to a healthcare provider or authority figure for assistance, but could

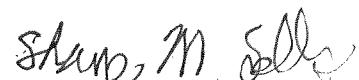
not bring himself to follow through in seeking help. This is exemplified by his initial comment to law enforcement, essentially asking “what took them so long?” His past behavior demonstrates that he is unlikely to self-regulate, but is capable of conforming his actions when he is monitored.

- The government and Mr. Sells are requesting the minimum term of incarceration, it is in the interest of justice that a lower term of incarceration be offset by the assurances that a lifetime of supervised release can provide the community.
- As noted in paragraph 94 of the presentence investigation report, the “statutory maximum term of supervised release is recommended” under the federal sentencing guideline provisions.

## ACKNOWLEDGMENTS

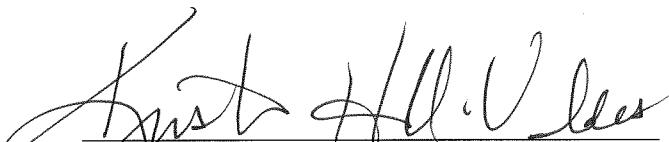
I am the defendant. I am entering into this plea agreement freely and voluntarily. I am not now on or under the influence of any drug, medication, alcohol, or other intoxicant or depressant, whether or not prescribed by a physician, which would impair my ability to understand the terms and conditions of this agreement. My attorney has reviewed every part of this agreement with me and has advised me of the implications of the sentencing guidelines. I have discussed all aspects of this case with my attorney and I am satisfied that my attorney has provided effective assistance of counsel.

Date: 05/11/2015

  
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SHANE M. SELLS  
Defendant

I am the defendant's attorney. I carefully have reviewed every part of this agreement with the defendant. To my knowledge, my client's decision to enter into this agreement is an informed and voluntary one.

Date: 5/11/15

  
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KRISTA HALLA-VALDES  
Attorney for Defendant

For the United States of America:

Date: 5/11/15

  
\_\_\_\_\_  
JAMES L. SANTELLE  
United States Attorney

Date: 5/11/15

  
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DANIEL R. HUMBLE  
Assistant United States Attorney